

FILED
Clerk
District Court

JUN - 9 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

1 MARK B. HANSON, ESQ.
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PMB 738 P.O. Box 10,000
3 Saipan, Mariana Islands 96950
Telephone: (670) 233-8600
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5 Attorney for Plaintiffs

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7 IN THE UNITED STATES DISTRICT COURT
FOR THE
8 NORTHERN MARIANA ISLANDS

9 LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

10 Plaintiffs,)

11 vs.)

12 JUNG JIN CORPORATION, a CNMI corporation,)
13 ASIA ENTERPRISES, INC., a CNMI corporation,)
PARK HWA SUN and KIM HANG KWON,)

14 Defendants.)

DECLARATION OF
MARK B. HANSON

15 I, MARK B. HANSON, do hereby declare as follows:

- 16 1. I am competent to testify, and if called to testify, I would do so in accord herewith.
17 2. I am the attorney for plaintiffs in the above-captioned case.
18 3. At my direction, on March 31, 2006, a letter was sent to Mr. Kim Ki Sung at the
19 address PMB 234, P.O. Box 10,001 informing him of the completion of the transcript of his
20 deposition and that a copy was available at my office. At true and correct copy of that letter is
21 attached hereto as Exhibit "A."
22 4. To date, Mr. Kim Ki Sung has never requested a copy of the completed transcript of
23 his deposition.
24 5. On May 22, 2006, after having learned of the untimely objection of Kim Ki Sung and
25 KSK Corporation to a Motion to Amend already granted by the Court, I contacted Robert Torres,
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1 attorney for those parties, and informed him, among other things, that he could request a copy of the
2 certified transcript of Mr. Kim Ki Sung's deposition, that I would provide him, upon request, a copy
3 of the video of the deposition, and that, upon request, I would give him a copy of a
4 contemporaneously made digital recording from which the transcript of the deposition was prepared.

5 6. To date, Mr. Torres has not made a request for any materials related to Mr. Kim Ki
6 Sung's deposition, including a copy of the complete, certified transcript of that deposition.

7 7. I am aware of the general order of the Court that transcripts of depositions are not to
8 be filed with the Court, but I have and can and will file the transcript for the Court's review if it
9 would like me to file the complete certified transcript.

10 I swear under the penalty of perjury that the above-stated facts are true and correct, and that
11 this Declaration was executed this 8th day of June, 2006 in Saipan, Commonwealth of the Northern
12 Mariana Islands.

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15 MARK B. MANSON
16 Attorney for Plaintiffs
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MARK B. HANSON
ATTORNEY AT LAW

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Admitted to practice: Commonwealth of the Northern Mariana Islands
State of Colorado

March 31, 2006


Mr. Kim Ki Sung
PMB 234, Box 10001
Saipan, MP 96950

RE: Notice of deposition transcript completion.

Dear Mr. Kim:

Please be advised that the transcript of your deposition held at the Law office of Mark B. Hanson on March 9, 2006 has been completed. A copy of the transcript is available at our office at First Floor Macaranas Building, Beach Road, Garapan, Saipan, MP 96950.

Thank you,



Mark B. Hanson